

To the Commissioners:

As a consumer and a voter, I'm extremely concerned about the potential rule changes that may be adopted at the Monday (2 June 2003) meeting, concerning the following issues:

Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996 (MB Docket No. 02-277); Cross-Ownership of Broadcast Stations and Newspapers (MM Docket No. 01-235); Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets (MM Docket No. 01-317); and Definition of Radio Markets (MM Docket No. 00-244).

The proposed rule changes seem likely to favor large media conglomerates at the expense of the public interest. The arguments that have been made in favor of these changes - including one made by Chairman Powell in an interview on NPR this morning - stress bringing federal regulations into line with the modern marketplace. However, trends in the marketplace, including those that took place after the 1996 relaxation of restrictions on radio station ownership, are sharply in the favor of corporate interests over those of the public. Corporations are granted license to broadcast over America's airwaves in exchange for a promise to use them in the public's interest. While most media companies operate with a profit motive, the system has worked, to varying extents, since the creation of the FCC.

Radio stations, TV stations, and other broadcast entities that operated on a local level have always included some public interest programming - local news, information on political events and elections, and other material vital to the functioning of a healthy democracy. People get their information about the world beyond their neighborhood from the media - radio, television, newspapers. A diversity of options for this information is essential. The recent massive consolidation of radio station ownership, and other past experiences, have shown that allowing corporations to purchase media outlets without check consistently REDUCES the public's access to different programming and different information.

Programming in the public interest is not a profit-making enterprise, despite Commissioner Powell's assertion to the contrary in his NPR interview. Broadcast outlets are required to do this sort of programming because their license to operate is received in exchange for holding the public trust. Mr. Powell stated that local news programs bring in more advertising dollars for local TV stations than other programming... but stations owned by the large national networks do LESS programming of this sort. Mr. Powell suggests that allowing these networks to buy up more of their local affiliates will somehow reverse the trend. Why? These networks exist to make money for their shareholders. Nationally-produced programming distributed on a national basis is much, much cheaper than funding local stations to maintain news operations, to do investigative reporting on politics or other local issues. Why should these networks pay to maintain that kind of function at each station they own, when they can get the same sort of advertising revenue without them, when consumers have no other options due to consolidated ownership?

Network affiliates' news programs already are full of 'infotainment' and plugs for network shows. Mr. Powell mentioned that allowing consolidation will enable local affiliates to continue to show free programming, instead

of letting it all migrate to cable. Does he mean the pervasive 'reality TV' shows, incredibly cheap for networks to produce, and pandering to the lowest common denominator in American culture? In the past decade, these shows have almost taken over networks' other programming.

To conclude:

I feel that the proposed rules changes are against the public interest, and should be denied.

Thank you,  
Shai Laric  
slaric@slaric.com